

## REMARKS

Claim 2 has been amended to be rewritten in independent form and is otherwise unchanged.

The Examiner indicated claims 12-30 are deemed allowable over the prior art of record at this time, pending resolution of any rejections noted below. Applicants gratefully acknowledge the Examiner's indication of allowed subject matter.

The Examiner objected to claim 3 as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. Applicants gratefully acknowledge the Examiner's indication of allowable subject matter.

The Examiner objected to claim 19 under 37 CFR.175(d)(1).

The Examiner rejected claims 19, 24, 25, 28, 29 and 30 under 35 U.S.C. § 112, second paragraph.

The Examiner rejected claims 1, 4-11 and 19-30 under 35 U.S.C. § 101 because the claimed invention is allegedly directed to non-statutory subject matter.

The Examiner rejected claims 1, 2 and 4-11 under 35 U.S.C. § 102(b) as allegedly being anticipated by Buffet *et al.*, hereinafter Buffet, USP 6,584,596.

Applicants respectfully traverse the claim objection, and the § 112, § 101 and § 102 rejections, with the following arguments.

### **Claim Objection**

The Examiner objected to claim 19 under 37 CFR.175(d)(1). The Examiner argues:  
“Claim 19 is objected to under 37 CFR 1.75(d)(1), wherein the claim contains the following grammatical error. The phrase "dimensions substantially equal" [line 11] is understood to mean "dimensions *being* substantially equal".”

In response, Applicants have amended the identified phrase in claim 19 to be “dimensions being substantially equal” in conformity with the Examiner’s understanding.

Accordingly, Applicants respectfully request that the objection of claim 19 be withdrawn.

**35 U.S.C. § 112, Second Paragraph**

The Examiner rejected claims 19, 24, 25, 28, 29 and 30 under 35 U.S.C. § 112, second paragraph. The Examiner identified language alleged to be vague and indefinite in claims 19, 24, 25, 28, 29 and 30.

In response, Applicants have amended the claims in a manner that addresses the language alleged by the Examiner to be vague and indefinite.

Accordingly, Applicants respectfully request that the rejection of claims 19, 24, 25, 28, 29 and 30 under 35 U.S.C. § 112, second paragraph be withdrawn.

### **35 U.S.C. § 101**

The Examiner rejected claims 1, 4-11 and 19-30 under 35 U.S.C. § 101 because the claimed invention is allegedly directed to non-statutory subject matter.

The Examiner argues that “the claims of the present invention do not meet the criteria for a statutory process”.

### **Claims 1 and 4-11**

Applicants respectfully contend that the rejection of claims 1 and 4-11 under 35 U.S.C. § 101 is moot, because claims 1 has been canceled and claims 4-11 have been amended to depend from claim 2 which has not been rejected under 35 U.S.C. § 101.

Accordingly, Applicants respectfully request that the rejection of claims 4-11 under 35 U.S.C. § 101 be withdrawn.

### **Claims 19-21**

The Examiner argues that “the claims of the present invention do not meet the criteria for a statutory process”.

In response, Applicants respectfully contend that claims 19-21 do not recite a process but rather recite a system. Therefore, the Examiner’s basis for rejecting claims 19-22 is misdirected.

Accordingly, Applicants respectfully request that the rejection of claims 19-21 under 35 U.S.C. § 101 be withdrawn.

Claims 22-30

Claim 19 has been amended to include the feature of “outputting a description of said circuit subdivisions to create said model for use in an electrical circuit simulator” which is similar to the feature in claim 2 of “outputting a description of said first and second equivalent circuits configured for use in an electrical circuit simulator” which has enabled claim 2 to avoid being rejected under 35 U.S.C. § 101.

Accordingly, Applicants respectfully request that the rejection of claims 22-30 under 35 U.S.C. § 101 be withdrawn.

**35 U.S.C. § 102(b)**

The Examiner rejected claims 1, 2 and 4-11 under 35 U.S.C. § 102(b) as allegedly being anticipated by Buffet *et al.*, hereinafter Buffet, USP 6,584,596.

Applicants respectfully contend that the rejection of claim 1 under 35 U.S.C. § 101 is moot, because claim 1 has been canceled

Applicants respectfully contend that Buffet does not anticipate claim 2, because Buffet does not teach each and every feature of claim 2. For example, Buffet does not teach the feature “partitioning said geometries into a plurality of cells, said cells having a characteristic size in each dimension of said geometries, wherein said characteristic size is derived from a fastest signal rise time of a signal adapted to propagate within the microelectronic package”.

The Examiner argues that Buffet, col. 5, lines 14-20 teaches the claimed feature of “wherein said characteristic size is derived from a fastest signal rise time of a signal adapted to propagate within the microelectronic package”.

In response, Applicants note that Buffet, col. 5, lines 14-20 recites: “Generally, voltage island 125 is drawing IPEAK for only a short time, but the power buses must be able to supply IPEAK without exceeding IR and L dl/dt drop limits. IAVG is the time averaged current voltage island 125 is drawing. dl/dt is the rate of rise or fall of current in voltage island 125. The power buses must be able to supply quick rises and falls in current without exceeding IR and L dl/dt drop limits.”

Applicants respectfully contend that the preceding quote of Buffet, col. 5, lines 14-20 is totally silent as to a characteristic size in each dimension comprised by said cells, as claimed in claim 2.

Therefore, Buffet does not anticipate claim 2.

Based on the preceding arguments, Applicants respectfully maintain that Buffet does not anticipate claim 2, and that claim 2 is in condition for allowance. Since claims 4-11 depend from claim 2, Applicants contend that claims 4-11 are likewise in condition for allowance.

### CONCLUSION

Based on the preceding arguments, Applicants respectfully believe that all pending claims and the entire application meet the acceptance criteria for allowance and therefore request favorable action. If the Examiner believes that anything further would be helpful to place the application in better condition for allowance, Applicants invites the Examiner to contact Applicants' representative at the telephone number listed below. The Director is hereby authorized to charge and/or credit Deposit Account 09-0456.

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Jack P. Friedman  
Jack P. Friedman  
Registration No. 44,688

Schmeiser, Olsen & Watts  
22 Century Hill Drive - Suite 302  
Latham, New York 12110  
(518) 220-1850